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9 *Attorney for Defendants YouTube, LLC*
10 *and Google LLC*

11 UNITED STATES DISTRICT COURT
12
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14
15 OAKLAND DIVISION

16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY
18 PRODUCTS LIABILITY LITIGATION,

MDL No. 3047

Case No.: 4:23-cv-03065-YGR

19 THIS DOCUMENT RELATES TO:

20 *Board of Education of Harford County v. Meta*
21 *Platforms Inc., et al.,*

22 **DECLARATION OF ASHLEY W.**
23 **HARDIN IN SUPPORT OF**
24 **DEFENDANTS' NOTICE OF**
25 **MOTION AND MOTION FOR**
26 **SUMMARY JUDGMENT (HARFORD)**
27 **(SD MSJ NO. 6)**

DECLARATION OF ASHLEY W. HARDIN

I, Ashley W. Hardin, declare as follows:

1. I am a partner with the law firm Williams & Connolly LLP, counsel of record for Defendants YouTube, LLC and Google LLC. This declaration is based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto. I offer this declaration without waiving or intent to waive attorney-client privilege.

2. Attached as Exhibit 1 is a true copy of Plaintiff Board of Education of Harford County's public website: *State of the District*, Harford Cnty. Pub. Schs., <https://www.hcps.org/superintendent/stateofthedistrict.aspx> (last visited Sept. 27, 2025).

3. Attached as Exhibit 2 is a true copy of excerpts from the May 15, 2025 Deposition of Superintendent Sean W. Bulson ("May 15, 2025 Bulson Dep.").

4. Attached as Exhibit 3 is a true copy of a document Plaintiff Board of Education of Harford County produced in this litigation bearing Bates stamps HCPS_00016071 to HCPS_00016096.

5. Attached as Exhibit 4 is a true copy of a document Plaintiff Board of Education of Harford County produced in this litigation bearing Bates stamps HCPS_00017428 to HCPS_00017431.

6. Attached as Exhibit 5 is a true copy of excerpts from the 30(b)(6) Deposition of Supervisor of Safety and Security Donovan Brooks ("Brooks 30(b)(6) Dep.").

7. Attached as Exhibit 6 is a true copy of excerpts from the 30(b)(6) Deposition of Supervisor of Pupil Personnel Services Dwayne Edward Williams ("Williams 30(b)(6) Dep.").

8. Attached as Exhibit 7 is a true copy of excerpts from the Deposition of Assistant Superintendent for Business Services Deborah Judd ("Judd Dep.").

9. Attached as Exhibit 8 is a true copy of a document Plaintiff Board of Education of Harford County produced in this litigation bearing Bates stamps HCPS_00106625 to HCPS_106669.

1 10. Attached as Exhibit 9 is a true copy of a document Plaintiff Board of Education of
2 Harford County produced in this litigation bearing Bates stamp HCPS_00096094. HCPS_00096094
3 was produced in native Power Point format. The attached exhibit has been converted to .pdf format.

4 11. Attached as Exhibit 10 is a true copy of a document Plaintiff Board of Education of
5 Harford County produced in this litigation bearing Bates stamps HCPS_00029159 to
6 HCPS_00029168.

7 12. Attached as Exhibit 11 is a true copy of a document Plaintiff Board of Education of
8 Harford County produced in this litigation, bearing Bates stamps HCPS_00432372 to
9 HCPS_00432898.

10 13. Attached as Exhibit 12 is a true copy of a document Plaintiff Board of Education of
11 Harford County produced in this litigation bearing Bates stamps HCPS_00323427 to
12 HCPS_00323428.

13 14. Attached as Exhibit 13 is a true copy of Plaintiff Board of Education of Harford
14 County's Amended Objections and Responses to Defendants' Interrogatories (Set 3) dated April 14,
15 2025.

16 15. Attached as Exhibit 14 is a true copy of a document Plaintiff Board of Education of
17 Harford County produced in this litigation bearing Bates stamps HCPS_00122261 to
18 HCPS_00122266.

19 16. Attached as Exhibit 15 is a true copy of the Home Page of Plaintiff Board of
20 Education of Harford County's public website: Harford Cnty. Pub. Schs., <http://www.hcps.org> (last
21 visited Sept. 27, 2025).

22 17. Attached as Exhibit 16 is a true copy of a document Plaintiff Board of Education of
23 Harford County produced in this litigation bearing Bates stamps HCPS_00347775 to
24 HCPS_00347776.

25 18. Attached as Exhibit 17 is a true copy of a document Plaintiff Board of Education of
26 Harford County produced in this litigation bearing Bates stamps HCPS_00114511 to
27 HCPS_00114545.

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1 19. Attached as Exhibit 18 is a true copy of excerpts from the March 14, 2025 30(b)(6)
2 Deposition of Director of Technology Andrew Moore (“March 14, 2025 Moore 30(b)(6) Dep.”).

3 20. Attached as Exhibit 19 is a true copy of excerpts from the May 9, 2025 Deposition
4 of Superintendent Sean Bulson (“May 9, 2025 Bulson Dep.”).

5 21. Attached as Exhibit 20 is a true copy of a document Plaintiff Board of Education of
6 Harford County produced in this litigation bearing Bates stamps HCPS_00537476 to
7 HCPS_00537480.

8 22. Attached as Exhibit 21 is a true copy of excerpts from the 30(b)(6) Deposition of
9 Assistant Superintendent for Student Support Services Bernard Hennigan (“Hennigan 30(b)(6)
10 Dep.”).

11 23. Attached as Exhibit 22 is a true copy of excerpts from the March 14, 2025 Deposition
12 of Director of Technology Andrew Moore (“March 14, 2025 Moore Dep.”).

13 24. Attached as Exhibit 23 is a true copy of excerpts from the Deposition of Supervisor
14 of Safety and Security Donovan Brooks (“Brooks Dep.”).

15 25. Attached as Exhibit 24 is a true copy of a document Plaintiff Board of Education of
16 Harford County produced in this litigation bearing Bates stamps HCPS_00228706 to
17 HCPS_00228711.

18 26. Attached as Exhibit 25 is a true copy of a document Plaintiff Board of Education of
19 Harford County produced with its Initial Plaintiff Fact Sheet and, again, as reliance material for its
20 expert, Dr. Sharon Hoover. The file is titled “2022-23 SBMH Data.”

21 27. Attached as Exhibit 26 is a true copy of the August 8, 2025 Amended Expert Report
22 of Dr. Bryce Ward (“Am. Ward Harford Rep.”).

23 28. Attached as Exhibit 27 is a true copy of the May 18, 2025 Expert Report of Robert
24 L. Klein for Board of Education of Harford County (“Klein Rep.”).

25 29. Attached as Exhibit 28 is a true copy of excerpts from the Deposition of Assistant
26 Superintendent for Student Support Services Bernard Hennigan (“Hennigan Dep.”).

27 30. Attached as Exhibit 29 is a true copy of excerpts from the Deposition of Expert Dr.
28 Bryce Ward (“Ward Dep.”).

1 31. Attached as Exhibit 30 is a true copy of the May 19, 2025 Expert Report of Jeffrey
2 E. Meyers (“Meyers Harford Rep.”).

3 32. Attached as Exhibit 31 is a true copy of excerpts from the May 29, 2025 30(b)(6)
4 Deposition of Director of Technology Drew Moore (“May 29, 2025 Moore 30(b)(6) Dep.”).

5 33. Attached as Exhibit 32 is a true copy of the June 20, 2025 Amended Expert Report
6 of Dr. Sharon A. Hoover for Board of Education of Harford County (“Am. Hoover Harford Rep.”).

7 34. Attached as Exhibit 33 is a true copy of excerpts from the August 12, 2025
8 Deposition of Dr. Sharon Hoover (“August 12, 2025 Hoover Dep.”).

9 35. Attached as Exhibit 34 is a true copy of excerpts from the August 13, 2025
10 Deposition of Dr. Sharon Hoover (“August 13, 2025 Hoover Dep.”).

11 36. Attached as Exhibit 35 is a true copy of excerpts from the Deposition of Director of
12 Communications Jillian Lader (“Lader Dep.”).

13 37. Attached as Exhibit 36 is a true copy of a document Plaintiff Board of Education of
14 Harford County produced in this litigation bearing Bates stamps HCPS_00046480 to
15 HCPS_00046504.

16 38. Attached as Exhibit 37 is a true copy of Board of Education of Harford County’s
17 Second Supplemental Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure
18 26(A)(i)(A)(iii), dated November 15, 2024 (“Harford’s Second Supp. Initial Disc.”).

19 39. Attached as Exhibit 38 is a true copy of excerpts from the 30(b)(6) Deposition of
20 Assistant Superintendent for Business Services Deborah Judd (“Judd 30(b)(6) Dep.”).

21 40. Attached as Exhibit 39 is a true copy of the August 1, 2025 Rebuttal Expert Report
22 of Dr. Sharon A. Hoover (“Reb. Hoover Harford Rep.”).

23 41. Attached as Exhibit 40 is a true copy of excerpts from the Deposition of Expert
24 Jeffrey E. Meyers (“Meyers Dep.”).

25 42. Attached as Exhibit 41 is a true copy of the June 20, 2025 Amended Expert Report
26 of Dr. Douglas L. Leslie for Board of Education of Harford County (“Leslie Harford Rep.”).

27 43. Attached hereto and identified as Exhibit 42 is a true copy of Robert G. Cassilly,
28 County Executive, *Harford County – Budget in Brief: Approved Fiscal Year 2025*, available on

1 Plaintiff Board of Education of Harford County's public website: Harford Cnty. Pub. Schs.,
2 <https://user-60zwye.cld.bz/FY-25-Harford-County-Approved-Budget-in-Brief> (last visited Sept.
3 27, 2025) (also accessible through [https://www.harfordcountymd.gov/3747/Approved-FY25-](https://www.harfordcountymd.gov/3747/Approved-FY25-Budget)
4 [Budget](https://www.harfordcountymd.gov/3747/Approved-FY25-Budget)).

5 44. Attached as Exhibit 43 is a true copy of excerpts from the Deposition of Dr. Douglas
6 L. Leslie ("Leslie Dep.").

7 45. Attached as Exhibit 44 is a true copy of the May 16, 2025 Expert Report of Tim Estes
8 ("Estes Rep.").

9 46. Attached as Exhibit 45 is a copy of Meta Defendants' Response and Objections to
10 Plaintiffs' Rule 30(b)(6) Written Questions to Meta Defendants Meta Platforms, Inc.; Facebook
11 Payments, Inc.; Siculus, Inc.; Facebook Operations, LLC; and Instagram, LLC on Topics 3-6, which
12 was served on July 25, 2024, as provided by Meta's counsel.

13 47. Attached as Exhibit 46 is Defendants' Proposed Order.

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15 /s/ Ashley W. Hardin

16 Ashley W. Hardin
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